

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

_____)	
PAUL JONES)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 19-cv-11093-TSH
)	
MONTACHUSETTS REGIONAL)	
TRANSIT AUTHORITY,)	
HB SOFTWARE SOLUTIONS, INC.,)	
REBECCA BADGLEY, DONNA)	
LANDRY, BONNIE MAHONEY,)	
KAREN CORDIO, JOANNE NORRIS,)	
STEPHANIE RICHARDS, TAMARA)	
SHUMOVSKAYA, JESSICA TORRES)	
AMANDA KUKTA, ROBERT MONK,)	
MICHELLE MOYO, IVAN ROMAN,)	
CRYSTAL GEISERT, JANE DOE and)	
JOHN DOE)	
)	
Defendants.)	
_____)	

HB SOFTWARE SOLUTIONS, INC.’S
MOTION TO DISMISS

In accordance with Fed. R. Civ. P. 12(b)(6), Defendant HB Software Solutions, Inc. (“HBSS”) requests that the Court dismiss those claims asserted by the Plaintiff Paul Jones’ (“Mr. Jones”) against HBSS. As grounds therefore, HBSS respectfully refers the Court to the accompanying memorandum of law.

WHEREFORE, for the forgoing reasons, HB Software Solutions, Inc. respectfully requests that the Court allow its motion to dismiss.

Respectfully submitted,

HB SOFTWARE SOLUTIONS, INC.

By its attorneys,

/s/ David H/ Rich

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Dated: August 13, 2019

CERTIFICATE OF SERVICE

I, David H. Rich, hereby certify that this document has been filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on August 13, 2019.

/s/ David H. Rich

David H. Rich (BBO #634275)